

Lexington  
Fayette  
Urban  
County  
Government



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MAR 1 2004

PUBLIC SERVICE  
COMMISSION

February 26, 2004

DEPARTMENT OF LAW

Thomas M. Dorman, Executive Director  
Public Service Commission of Kentucky  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

Re: Case No. 2003-00434

Dear Mr. Dorman:

Please find enclosed herewith for filing the Lexington-Fayette Urban County Government's Supplemental Requests for Information in the referenced matter, along with 8 copies of the same. Please contact me should you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "David J. Barberie".

David J. Barberie  
Corporate Counsel

ENCLOSURES

DJB/let382

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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MAR 1 2004

PUBLIC SERVICE  
COMMISSION

In the Matter of:

AN ADJUSTMENT OF THE )  
ELECTRIC RATES, TERMS AND )  
CONDITIONS OF KENTUCKY )  
UTILITIES COMPANY )

CASE NO. 2003-00434

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S SUPPLEMENTAL REQUESTS FOR INFORMATION**

Comes now the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of January 14, 2004 and submits its Supplemental Requests for Information to Kentucky Utilities Company ("KU") to be answered in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the company witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

## SUPPLEMENTAL REQUESTS FOR INFORMATION

1. Please refer to LFUCG Initial Request for Information No. 2. How many additional customers (and of which particular customer rate class) does KU anticipate adding over the next 5 years? What is the anticipated level of additional revenue to KU as result of the addition of these customers?

2. Please refer to LFUCG Initial Request for Information No. 4. Please provide the current total cost to KU of acquiring (pole and associated equipment, etc.) and installing each type of public street light, as well as a break down of the cost of labor, materials, equipment, and any other associated costs for each type of street light. Also provide copies of the most recent contracts for purchase of each type of light fixture and pole type.

(a) What is the typical life expectancy of each street light fixture for which KU provided information in its response?

(b) Please provide the "installed values" (labor, associated materials, equipment, etc.) typically borne by KU for each type of street light.

3. Please refer to LFUCG Initial Request for Information No. 7. Is none of the information that KU provided in its response in the form of a written policy, procedure, practice and/or guideline provided to KU's employees and/or agents? If so, please provide all such documentation (as previously requested). If not, please explain why not, and also explain how such policies, procedures, practices and/or guidelines can be expected to be consistently enforced and/or followed if they are not in written form.

(a) Please describe and explain in detail KU's "lighting patrols" (see Response to 7(a)) and provide all applicable information and supporting documentation. For example, how often and at what times and in what areas do these "patrols" take place?

(b) For each type of repair order generated by a person or entity described in KU's response to LFUCG 7(a)(i.e., employees and contractors, customers, LFUCG personnel, police, fire, etc.) please provide the annual number of such repair orders generated for each such person or entity. For example, what percentage of repairs are generated by the "lighting patrols" versus complaints? Please provide any and all supporting documentation.

(c) What percentage of public street light repairs are typically repairs to the same particular street light? Does KU maintain a regular schedule to replace antiquated public street lights? Please provide a detailed explanation as well as all supporting documentation.

(d) Please describe in detail the process for a citizen to make a complaint regarding a street light, and include any applicable points of contact, addresses and telephone numbers, and how the location of the light is to be described to KU (if not by street address). If this process or the required information differs for complaints made by the LFUCG or its divisions, please provide the additional information.

(e) Does KU in any way educate the public as to how or to whom to complain about a public street light that does not work properly? If so, please describe in detail all such efforts made by KU in the last 5 years and provide copies of any applicable materials.

(f) For each of the past 5 years, please provide the total number of public street lights that KU has performed maintenance work on in Fayette County. If this information is not available by county, please provide this information for KU's entire service area. If available, please also provide the type of maintenance work performed in each instance.

4. Please refer to LFUCG Initial Request for Information No. 8. Please further break out the costs involved in maintenance. How many man hours are typically involved in performing the maintenance work described in KU's response, and what is the typical associated cost? If possible, please provide the typical total cost of repair, including a break out of all maintenance, equipment, supplies, material, fixtures, etc., involved in such maintenance for the performance of each work provided in the response.

(a) With respect to the \$2.27 million amount that you have provided, does this include fixtures and equipment, or does it only include the cost of man hours? Please provide a detailed explanation and break down of all factors included in this amount.

5. Please refer to KU's response to LFUCG Initial Request for Information No. 9(a). Please provide all documentation supporting KU's contention that "[a]t any given time, on average, less than 1% of the total lights are reported as not in proper working order."

(a) Is any particular type of public street light more likely to require repeat maintenance? If so, please identify all such types and how frequently such repeat maintenance is typically required.

6. Please refer to LFUCG Initial Request for Information No. 10. Please provide the information requested in general form, rather than for each specific type of street light.

(a) Please describe in detail each element of the proposed monthly rate for public street lights in general (maintenance and operations, etc.), including the percentage of the rate attributable to each element.

(b) Does this differ from the existing rate elements? If so, in what regard?

(c) What percentage of KU's proposed monthly rate for public street lights is comprised of maintenance?

(d) What percentage of KU's proposed monthly rate for public street lights is comprised of costs associated with acquiring or installing the street light?

7. Please refer to KU's response to LFUCG Initial Request for Information No. 14. Please provide a detailed explanation of the basis for KU's statement that "[f]or the lighting class as a whole, Kentucky Utilities could have justified a higher increase", and provide any supporting documents or work papers.

8. Please refer to LFUCG Initial Request for Information No. 20. Is none of the information that KU provided in its response in the form of a written policy, procedure, practice and/or guideline provided to KU's employees and/or agents? If so, please provide all such documentation (as previously requested). If not, please explain why not, and also explain how such policies, procedures, practices and/or guidelines can be expected to be consistently enforced and/or followed if they are not in written form. Also provide a copy of the "ISA recommendations" and the recommendations in "Pruning Trees Near Electric Utility Lines" referenced in KU's response.

9. Please refer to KU's Response to LFUCG Initial Request for Information No. 23(a). Please described in detail how such costs or expenses are otherwise reflected in KU's overall costs or expenses and in which categories this is the case. Will this proposed tariff not in some way result in KU receiving compensation more than once for performing the same service?

10. Please refer to LFUCG Initial Request for Information No. 25. Does KU knowingly allow any other utilization of public street lights for which the LFUCG is paying tariffs? In other words, does KU allow other entities (other than the LFUCG) to make use of street lights for which the LFUCG is charged? If so, please provide a detailed explanation of each different type of such utilization that occurs in Fayette County, the extent of each type of utilization, the names of any parties that have agreements with KU regarding such useage in Fayette County, the amount and type of compensation or consideration (monetary or otherwise) that KU typically receives for such useage, copies of any pertinent agreements for such useage, and the total amount of compensation that KU receives for such activities.

11. For each type of private street light designation for which the proposed tariff is less than the comparable type of public street light, please provide a detailed explanation for the justification for the difference in the charge.

12. Does KU agree that certain types of public street lights for which the LFUCG pays a monthly tariff are more efficient than others with respect to the street light's typical consumption or use of power or electricity? Please indicate all of the types of lights for which this is the case, and the difference in consumption or use power or electricity that is typically found with the use of the more efficient street light.

13. Please explain in detail KU's justification for not basing the public street light tariffs on the actual level of consumption or use of power or electricity by each particular type of street light. Please provide all information that is available to support this treatment of public street lights, and explain in detail how this is consistent with KU's position that "rates should reflect cost-of-service" (see e.g., Testimony of Seelye in Response to Attorney General First data Request No. 171).

14. Has KU ever performed a cost of service or similar study in which the cost of public street lights was based upon the consumption or use of power or electricity by each type of respective street light? If so, please provide the results of any such study or studies and copies thereof.

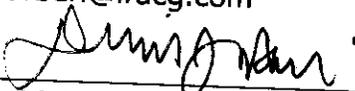
15. With respect to any type of public street light for which the LFUCG pays a monthly tariff, was a volume discount rate applied as to the acquisition cost of the street light and/or any of its components (i.e., fixtures, poles, associated equipment, etc.)? If not, please provide the resulting amount in reduction in cost that such an application would have, as well as the overall reduction in cost to each proposed tariff that would be effected.

16. Does KU have any immediate or future plans that in any way effect its current level of resources (e.g. - manpower, number of employees, facilities, operations, etc.) committed to Fayette County, Kentucky? If so, please describe in detail any such plans and when they are proposed to take place.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN  
COUNTY GOVERNMENT  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507  
(859) 258-3500  
E-Mail: dbarberi@lfucg.com

BY:

  
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David J. Barberie  
Corporate Counsel  
Leslye M. Bowman  
Director of Litigation

NOTICE AND CERTIFICATION

I hereby certify that an original and eight (8) copies of the Lexington-Fayette Urban County Government's Initial Requests for Information were filed with the Public Service Commission, attention: Thomas Dorman, Executive Director, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615 by first class U.S. Mail delivery, postage prepaid; furthermore, it was served by mailing a copy by first class U.S. Mail delivery, postage prepaid, on the following, all on this the 26<sup>th</sup> day of February 2004.

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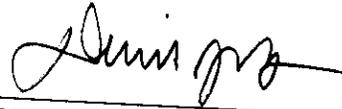
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URBAN COUNTY GOVERNMENT

G:DJB\PSC\KU Rate Case\RFI-2